

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

Protect Our Parks, Inc.; Charlotte Adelman;)	
Maria Valencia and Jeremiah Jurevis;)	No. 18-cv-03424
Plaintiffs,)	
v.)	Honorable John Robert Blakey
)	
Chicago Park District and City of Chicago,)	Jury Demanded
Defendants.)	

PLAINTIFFS' FIRST SET OF INTERROGATORIES TO CITY OF CHICAGO

Now come the Plaintiffs, Protect Our Parks, Inc.; Charlotte Adelman; Maria Valencia and Jeremiah Jurevis, through their undersigned attorneys, and pursuant to Rule 33 of the Federal Rules of Civil Procedure request that the Defendant, City of Chicago, answer the following Interrogatories within 30 days from service of this Plaintiffs' First Set Of Interrogatories To City Of Chicago.

DEFINITIONS

The term "person" refers to both natural persons and to corporate or other business entities, whether or not in the employ of the City of Chicago.

To "identify a person" means to state the person's name, business address and telephone number and, additionally, in the case of a natural person, his home address, employer, present occupation, job title and telephone number.

"You" or "yours" shall mean the City of Chicago.

INTERROGATORIES

1. Identify by name, title, address and telephone number, all persons answering these interrogatories.

ANSWER:

2. Identify all evidence you intend to introduce at any hearing or trial in this case, including but not limited to the names, addresses and last known addresses of all witnesses, the expected testimony of such witnesses and a description of all documents you intend to present into evidence.

ANSWER:

3. Identify each person whom you believe has knowledge regarding the allegations contained in Plaintiff's Complaint, or your Answer and Affirmative Defenses to the Complaint, and state the nature, scope and extent of each such person's knowledge.

ANSWER:

4. Identify each person, including each and every expert or potential expert, that you have contacted regarding any of the matters that are or may be at issue based upon any of the allegations or defenses included in the Plaintiff's Complaint or your Answer and Affirmative Defenses to the Complaint, and, with respect to each such person:

- a. Identify and describe the nature, scope and extent of each such person's knowledge;
- b. Identify each opinion, comment and/or communication made by or to that person regarding any of the matters that are or may be at issue in this litigation;
- c. State the basis for each such opinion and/or communication referenced in subpart b hereof;

- d. If that person is expected to testify in this matter, state the substance of that person's testimony;
- e. Identify all written reports or memoranda which that person prepared in connection with this case;
- f. Attach to your interrogatory answers copies of any written reports prepared in connection with this case;
- g. For all matters in which such person has given testimony in the last 10 years, identify the case name, case number, court where the action was/is pending, and the substance of that person's testimony and opinions; and
- h. Identify all articles, books, literature and other publications or papers on which that person will rely in connection with this case.

ANSWER:

Respectfully submitted,

/s/ Mark D. Roth

Mark D. Roth

Roth Fioretti, LLC
Mark Roth
Robert Fioretti
311 S. Wacker Drive
Suite 2470
Chicago, IL 60606
Phone: (312) 922-6262
Fax: (312) 922-7747
Email: mark@rothfioretti.com
rwfchicago@yahoo.com

PROOF OF SERVICE

I, Mark Roth, an attorney, certify that I served the **Plaintiffs' First Set Of Interrogatories To City Of Chicago** by email transmission from mark@rothfioretti.com to the following persons at their email addresses shown below on or before 5:00 pm. on October 23, 2018.

Richard W. Burke, -

Burke, Warren, MacKay & Serritella, P.C.
330 North Wabash Avenue
22nd Floor
Chicago, IL 60611-3607
(312) 840-7000
Voluntary Withdraw (fax)
rburkesr@burkelaw.com

representing

Chicago Park District
(Defendant)

John Lawrence Hendricks

City Of Chicago Department Of Law
30 North Lasalle St, Suite 1230
Chicago, IL 60602
(312) 744-6975
Not a member (fax)
john.hendricks@cityofchicago.org

representing

City Of Chicago
(Defendant)

Susan M. Horner

Burke Warren MacKay & Serritella
330 N. Wabash Ave.
22nd Floor
Chicago, IL 60611
312 840 7000
Delinquent (fax)
shorner@burkelaw.com

representing

Chicago Park District
(Defendant)

Elizabeth Meyer Pall
Burke, Warren, Mackay & Serritella, P.c.

330 N. Wabash
Suite 2100
Chicago, IL 60611
(312) 840-7099
Not a member (fax)
epall@burkelaw.com

Joseph P. Roddy
Burke, Warren, MacKay & Serritella, P.C.
330 N. Wabash Avenue,
22nd Floor
Chicago, IL 60611
(312) 840-7000
Active (fax)
jroddy@burkelaw.com

Justin Tresnowski
City of Chicago Department of Law
Constitutional and Commercial Litigation Division
30 N. LaSalle Street
Suite 1230
Chicago, IL 60602
(312) 744-4216
Not a member (fax)
jtresnowski@gmail.com

representing City Of Chicago
(Defendant)

Andrew W Worseck
City of Chicago, Department of Law
30 North LaSalle Street
Suite 1230
Chicago, IL 60602
(312) 744-7129
Active (fax)
aworseck@cityofchicago.org

/s/Mark Roth
Mark Roth

Mark Roth
Roth Fioretti LLC
Attorney No. 37547
311 S. Wacker, STE 2470
Chicago, Illinois 60606
(312) 922-6262
mark@rothfioretti.com